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Counsel for King Solarman, Inc.,

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re
 DOUBLE JUMP, INC.
 Debtor.

Lead Case No.: BK-19-50102-gs

(Chapter 7)

Affects:

- ☒ DC Solar Solutions, Inc.
- ☒ DC Solar Distribution, Inc.
- ☒ DC Solar Freedom, Inc.
- ☒ Double Jump, Inc.

Substantively consolidated with:

19-50130-gs	DC Solar Solutions, Inc.
19-50131-gs	DC Solar Distribution, Inc.
19-50135-gs	DC Solar Freedom, Inc.

CHRISTINA W. LOVATO

Plaintiff,

v.

KING SOLARMAN, INC., CHIANG LIAN
 CUNG a/k/a MICHAEL CUNG, KING
 SOLARMAN (INDION) FUND I, LLC, and
 KING SOLARMAN (INDION) FUND II, LLC

Defendants.

Adversary No.: 21-05028-gs

STIPULATION TO CONTINUE DATES IN
 SCHEDULING ORDER

1 WHEREAS, this adversary proceeding was commenced on January 22, 2021.

2 WHEREAS, this Court entered a scheduling order on July 28, 2022.

3
4 WHEREAS, in November and December, 2022, King Solarman's counsel, Kathryn Diemer,
5 spent three nonconsecutive weeks in Stanford Hospital due to a hospital acquired serious infection.

6 WHEREAS, The current deadlines under the scheduling order are as set forth below:

7 1. Pre-Discovery Disclosures. The parties have already made initial disclosures
8 pursuant to Fed. R. Civ. P. 26(a)(1).

9 2. Discovery Plan. The parties jointly propose to the court the following discovery
10 plan:

11 a. Discovery will be needed on all matters within the scope of F.R.C.P. 26(b).

12 b. Fact discovery commenced in time to be completed by February 28, 2023.

13 c. Supplementations under Rule 26(e) due March 20, 2023.

14 d. All discovery shall be governed by the Federal Rules of Civil Procedure, as
15 made applicable by the Federal Rules of Bankruptcy Procedure.

16 e. Disclosure of expert testimony under Rule 26(a) due from Plaintiff and from
17 Defendants by March 27, 2023.

18 f. Expert discovery commenced in time to be completed by May 1, 2023.

19 3. Other Items.

20 a. Plaintiff will be allowed until January 4, 2023 to join additional parties and
21 until January 4, 2023 to amend the pleadings.

22 b. Defendants will be allowed until January 4, 2023 to join additional parties and
23 until January 4, 2023 to amend the pleadings.

24 c. The parties shall mediate by April 3, 2023.

1 d. All potentially dispositive motions must be filed by May 18, 2023.

2 e. The parties request a pretrial conference in June 2023.

3 f. Final lists of witnesses and exhibits under Rule 26(a)(3) will be due from
4 Plaintiff and from Defendants seven days prior to the pretrial conference.

5 g. Parties shall have ten (10) days after service of final lists of witnesses and
6 exhibits to list objections under Rule 26(a)(3).
7

8 h. The case should be ready for trial by July 1, 2023 and at this time, the trial is
9 expected to take approximately three days.

10 i. The parties do not request a conference with the Court before entry of this
11 Order.

12 j. The parties request a status conference on August 11, 2022 and will endeavor
13 to schedule a status conference every 45 days thereafter.
14

15 k. This Order supersedes any prior scheduling order entered in this Adversary
16 Proceeding.

17 l. The Parties shall meet and confer if any other orders, statements, or directives
18 issued by the Court alter, affect, or relate to this Order.

19 m. All deadlines in this order are agreed to and entered subject to a motion to
20 modify such deadlines under the Federal Rules of Civil Procedure.
21

22 WHEREAS, the parties have met and conferred about an extension of dates to accommodate
23 counsel for King Solarman's health emergency.

24 WHEREAS, the health emergency of King Solarman's counsel constitutes good cause of
25 modification of the scheduling order.

26 **IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**
27
28

1 The scheduling order is modified as follows with changes underlined and bolded:

2 1. Pre-Discovery Disclosures. The parties have already made initial disclosures
3 pursuant to Fed. R. Civ. P. 26(a)(1).

4 2. Discovery Plan. The parties jointly propose to the court the following discovery
5 plan:

6 a. Discovery will be needed on all matters within the scope of F.R.C.P. 26(b).

7 b. Fact discovery commenced in time to be completed by **April 11**, 2023.

8 c. Supplementations under Rule 26(e) due **May 1**, 2023.

9 d. All discovery shall be governed by the Federal Rules of Civil Procedure, as
10 made applicable by the Federal Rules of Bankruptcy Procedure.

11 e. Disclosure of expert testimony under Rule 26(a) due from Plaintiff and from
12 Defendants by **May 8**, 2023.

13 f. Expert discovery commenced in time to be completed by **June 12**, 2023.

14 3. Other Items.

15 a. Plaintiff will be allowed until **February 14**, 2023 to join additional parties and
16 until **February 14**, 2023 to amend the pleadings.

17 b. Defendants will be allowed until **February 14**, 2023 to join additional parties and
18 until **February 14, 2023** to amend the pleadings.

19 c. The parties shall mediate by April 3, 2023.

20 d. All potentially dispositive motions must be filed by **June 29**, 2023.

21 e. The parties request a pretrial conference in August 2023.

22 f. Final lists of witnesses and exhibits under Rule 26(a)(3) will be due from
23 Plaintiff and from Defendants seven days prior to the pretrial conference.
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25
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g. Parties shall have ten (10) days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

h. The case should be ready for trial by **September 1**, 2023 and at this time, the trial is expected to take approximately three days.

k. This Order supersedes any prior scheduling order entered in this Adversary Proceeding.

l. The Parties shall meet and confer if any other orders, statements, or directives issued by the Court alter, affect, or relate to this Order.

m. All deadlines in this order are agreed to and entered subject to a motion to modify such deadlines under the Federal Rules of Civil Procedure.

Dated: 12/22/2022

DIEMER & WEI, LLP

/s/ Kathryn S. Diemer

Kathryn S. Diemer (*Pro Hac Vice*)

Counsel for King Solarman, Inc.

Dated: 12/22/2022

LAW OFFICE OF MICHAEL NISHIYAMA

/s/ Michael Nishiyama

Michael Nishiyama (*Pro Hac Vice* Forthcoming)

Counsel for Chiang Lian Cung

Dated: 2/1/2023

MELAND BUDWICK, P.A.

/s/ Meaghan Murphy

Meaghan Murphy

Counsel for Trustee Christina W. Lovato

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2023, I caused to be served the following document (s):

STIPULATION TO CONTINUE DATES IN SCHEDULING ORDER

I caused to be served the above -named document(s) as indicated below:

✓ a. Via Electronic Mail to:

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DATED: February 2, 2023.

/s/ Paul Johnson
Paul Johnson